



July 3, 2012

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Donald R. Duckworth
Executive Director

Dr. Jonathan Fielding, Director
Los Angeles County Health Department
313 N. Figueroa St
Los Angeles, CA 90012

Re: Proposed County Health Department Relaxation of Food Truck Regulations

Dear Dr. Jonathan Fielding:

We are writing because it has come to our attention that there is a possibility that County of Los Angeles health standards might be relaxed for food trucks particularly including required restroom availability standards. We oppose any relaxation of Health Department standards for food trucks that is not also provided to brick and mortar restaurants. We are bringing these proposed changes to your attention because we also believe that there are other community public policy issues that are at stake here and your Neighborhood Council may well want to express an opinion about them.

Here are some of those issues as we understand them:

- Are food trucks a beneficial use in our communities? Should "special event" food trucks be differentiated from on-going, day-to-day food trucks? Should different permits be required for each? What effect do food trucks have on real estate values, if any?
- Does a greater dispersion of food trucks in our communities provide more or less access to healthy foods? What minimum separations from schools or other sensitive uses should be maintained in the interests of public health / safety and traffic safety?
- Is it fair that restroom standards that apply to food trucks are different from those for brick and mortar restaurants? What other food service operational health standard differences exist? What permitting differences exist? How are these differences justified? Is there a difference in enforcement practices or their application between brick and mortar restaurants and food trucks?
- If a brick and mortar restaurant wants to provide outside or sidewalk dining, what standards must be met? How are any greater

restrictions on brick and mortar restaurants than on food trucks justified?

- What traffic safety and congestion minimization practices should be applied to food trucks? Are there maximum food truck concentrations that should be enforced at any particular location(s)?
- Should certain zoning requirements or approvals be required before food trucks may locate at any particular site as there are for brick and mortar restaurants? How should neighborhood acceptance / input be gauged / encouraged as it is for brick and mortar restaurant proposals? What about parking standards for food trucks? While zoning regulation is not apart of the Health Department's authority would the community's best interests not be served by soliciting the input of the various City Council, Planning, Building & Safety, Police, Fire, Traffic and other agencies before any regulation changes are adopted?
- Brick and mortar restaurants pay property taxes and special assessments to compensate the community for their impact on community infrastructure and service needs. How does this compensation compare with that provided by food trucks? If a food truck is dependant on public or private parking spaces for use of its customers, how is this cost compensated to the rightful owners of those spaces?
- Should more or different standards apply to food truck uses in City jurisdictions than in County territory? Should more or different standards apply in business improvement district areas than in non-BID areas?
- How is it that Health Department officials have conducted lengthy discussions with food truck industry representatives about potentially modifying health standards without open transparency and the involvement of other stakeholders such as the Neighborhood Councils, City agencies, business improvement districts, and community at large?

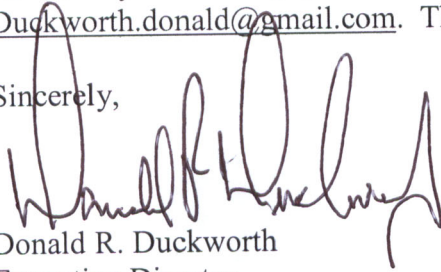
Certainly, any fair consideration of the issues would identify other issues as well.

We believe it is the best interests of our communities and the quality of life enjoyed in them for any consideration of the possible modifications of food truck health standards to be deferred until a comprehensive examination of the entirety of the above questions and others as may be identified is subject of thorough consideration and reflection by all. Nothing even approaching open involvement has been even attempted to date.

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July 2, 2012
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As we may answer any questions or assist you further, please contact me at
Duckworth.donald@gmail.com. Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Donald R. Duckworth', written over the word 'Sincerely,'.

Donald R. Duckworth
Executive Director

cc: Anthony Bellomo
Terrance Powell